

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: NONPARTY SUBPOENAS TO PPG
Industries, Inc.

Served in related cases:

*Maniya Allen, et al. v. American Cyanamid
Co., et al.*, E.D. Wisconsin
Case No. 2:11-cv-00055

*Dijonae Trammell, et al. v. American
Cyanamid Co., et al.*, E.D. Wisconsin
Case No. 2:14-cv-01423

Case No.

**PPG INDUSTRIES, INC.'S MOTION TO QUASH THE SHERWIN-WILLIAMS
COMPANY'S NONPARTY DOCUMENT AND DEPOSITION SUBPOENAS,**

PPG Industries, Inc. ("PPG") hereby moves pursuant to Rules 26(b) and 45(d)(3) of the Federal Rules of Civil Procedure to quash two subpoenas issued by The Sherwin-Williams Company ("Sherwin-Williams"), stating as follows:

1. On January 29, 2020, Sherwin-Williams served on PPG a Subpoena to Produce Documents and a Subpoena to Testify at a Deposition.
2. The subpoenas arise out of the white lead carbonate pigment litigation in the United States District Court for the Eastern District of Wisconsin, to which Sherwin-Williams is a defendant, and has been for many years. PPG is not a party to that litigation.
3. The wide-ranging subpoenas demand that PPG produce 32 categories of documents over a period starting in 1855 and spanning 123 years and further demand that PPG produce a company witness to testify to the company's activities and those records over that same lengthy and remote 123-year period.

4. The Court should quash the subpoenas entirely because Sherwin-Williams cannot meet its threshold burden to establish that the requested information is relevant to the underlying litigation.

WHEREFORE, for the reasons set forth above, and in the contemporaneously filed Memorandum of Law in Support, PPG respectfully requests that the Court grant its Motion to Quash the subpoenas and enter the attached proposed Order.

Date: February 26, 2020

/s/Chris M. Temple

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Attorneys for PPG Industries, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing PPG Industries, Inc.'s Motion to Quash The Sherwin-Williams Company's Nonparty Document and Deposition Subpoenas has been filed electronically and on this day has been served by electronic and U. S. mail on the following counsel for The Sherwin-Williams Company:

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Date: February 26, 2020

/s/Chris M. Temple

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